

O L S H A N

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Request GRANTED. The oral argument currently scheduled for March 6, 2025, is hereby adjourned to April 17, 2025, at 12:00 p.m.

February 28, 2025

VIA ECF

The Honorable Jennifer L. Rochon
U.S. District Court for the Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

Dated: March 3, 2025
New York, New York
SO ORDERED.

Jennifer Rochon
JENNIFER L. ROCHON
United States District Judge

Re: Murchinson Ltd. vs. Nano Dimension Ltd., Case No. 23-cv-3658 (JLR)

Dear Judge Rochon:

We write jointly on behalf of plaintiffs Murchinson Ltd., EOM Management Ltd., Nomis Bay Ltd., and BPY Limited, (“Murchinson”) and defendant Nano Dimension Ltd. (“Nano”) to request a 45-day adjournment of the oral argument on Defendants’ pending motion to dismiss, which is currently scheduled to be heard on March 6, 2025.

On August 9, 2023, Defendants filed a Motion to Dismiss the Complaint for lack of jurisdiction and failure to state a claim. That motion was fully briefed on September 26, 2023. On February 20, 2025, the Court scheduled oral argument on the motion to be heard on March 6, 2025.

As the Court is aware, litigation involving several of the parties to this dispute is also pending in Israel and in the Supreme Court of the State of New York, New York County Commercial Division (the “State Court”). On November 21, 2024, the Israeli Court issued a decision concerning Nano’s March 2023 Extraordinary General Meeting (the “Decision”).

The parties have begun global settlement discussions to resolve this case as well as the complex Israeli proceedings. We respectfully request that the Court adjourn the oral argument currently scheduled to be heard on March 6, 2025, for 45 days to allow the parties to complete settlement discussions.

In addition, in the wake of the Decision, the composition of Nano’s Board of Directors and management has substantially changed. In light of the potential for a conflict to develop between Nano and the Individual Defendants, BraunHagey & Borden LLP intends to withdraw from its representation of the Individual Defendants.¹ BraunHagey & Borden LLP has informed the Individual Defendants of its intention to withdraw and is conferring with the Individual Defendants surrounding the details of such withdrawal. BraunHagey & Borden LLP intends to file a motion

¹ The Individual Defendants include Yoav Stern, Amit Dror, Simon Anthony-Fried, Channa Caspi, Roni Kleinfeld, J. Christopher Moran, Yoav Nissan-Cohen and Igal Rotem.

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to withdraw shortly. A 45-day adjournment of the oral argument on Defendants' pending motion to dismiss will also provide ample time for the Individual Defendants to retain new counsel. We appreciate the Court's attention to this matter.

Respectfully,

/s/ Adrienne M. Ward
Adrienne M. Ward

Cc: All Counsel of Record